

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.

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DEC 5 - 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Advanced Television Systems )  
and Their Impact upon the ) MM Docket No. 87-268  
Existing Television Broadcast Service )

To: The Commission

SUPPLEMENTAL COMMENTS OF CHRIS-CRAFT/UNITED GROUP

Pursuant to the Commission's Public Notice of December 2, 1997, the Chris-Craft/United Group of television broadcast stations hereby submits the following comments in response to (i) the November 20, 1997, ex parte submission of the Association for Maximum Service Television, Inc. ("AMST") and certain other broadcasters (the "AMST Submission"), and (ii) the November 25, 1997, proposal of the Association of Local Television Stations, Inc. ("ALTV") concerning power increases (the "ALTV Submission").

Chris-Craft/United Group station KCOP is licensed to operate its existing NTSC station on channel 13, Los Angeles, California. In its Sixth Report and Order in this proceeding, the Commission allocated channel 66 as the channel for DTV operations by KCOP. While channel 66 may not be perfect for such operations, Chris-Craft/United Group has not objected to the

*OSL*

allocation and is willing to accept it,<sup>1</sup> at least assuming that the Commission adopts its proposal to assign channels 63-64 and 68-69 for land mobile/public safety use and otherwise provides the requisite protection to DTV stations on channels 60-69 against interference during the transition period.<sup>2</sup>

The AMST Submission now proposes substantial changes to the DTV allocations for the Los Angeles market, one of which would substitute channel 33 for channel 66 as KCOP's allotted channel. Chris-Craft/United Group objects to such an allocation because it would conflict with the UHF TV Broadcasting Agreement between the United States and Mexico dated June 18, 1982 (the "US/Mexican Agreement") and would result in unacceptable interference.

Channel 33 is already allotted to Tijuana, BN, Mexico. As noted in the attached engineering statement of Cohen, Dippell & Everest, the required minimum co-channel separation between a new US allotment and an existing Mexican allotment is 280km. But the distance between KCOP's DTV reference point and the Mexican allotment for channel 33 at Tijuana is only 211.6, a shortspacing of 69.4 km.

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<sup>1</sup> The Chris-Craft/United Group has been and remains a strong supporter of the conversion of broadcast television to digital channels and wants the process to move forward as quickly as possible. While in several cases the Chris-Craft/United Group would prefer channels which were proposed for other stations in their respective markets, Chris-Craft/United Group recognizes the difficulties faced by the Commission in attempting to develop a table of allocations that treats everyone fairly under the proposed allocation criteria and is willing, at least initially, to accept the allocations specified in the Sixth Report and Order for each of its eight stations.

<sup>2</sup> The most recent amendments to the Communications Act require the Commission to assure that full service NTSC and DTV stations operating on channels 60-69 are protected against interference during the transition period. See Section 337(d).

In addition, Cohen, Dippell & Everest have conducted an interference study, assuming operations from KCOP's DTV reference point and a full-power NTSC station from the Tijuana reference point, and have concluded that there would be interference in both the United States and Mexico. (Id.) Such interference would be contrary to the public interest. For these reasons, Chris-Craft/United Group objects to AMST's proposal to allocate channel 33 for DTV use by KCOP in Los Angeles.

The ALTV Submission sets forth a proposal for permitting DTV stations to increase power in situations that will not cause additional interference to other stations. Chris-Craft/United Group supports this proposal because it contains sensible procedures for allowing power increases and resolving engineering disputes expeditiously without causing additional interference.

Respectfully submitted,

CHRIS-CRAFT/UNITED GROUP

By    
Marvin J. Diamond

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164 Common Street, #365  
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December 5, 1997

ENGINEERING STATEMENT  
ON BEHALF OF  
KCOP TELEVISION, INC.  
OPPOSITION TO  
ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC.  
AND OTHER BROADCASTERS  
SUBMISSION DATED NOVEMBER 20, 1997  
DECEMBER 1997

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington            )  
  ) ss  
District of Columbia         )

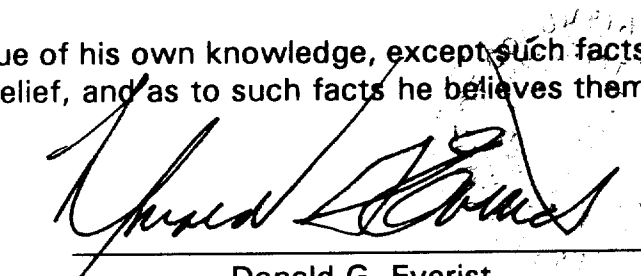
Donald G. Everist, being duly sworn upon his oath, deposes and states that:

He is a graduate electrical engineer, a Registered Professional Engineer in the District of Columbia, and is President of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio - Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;


That his qualifications are a matter of record in the Federal Communications Commission;

That the attached engineering report was prepared by him or under his supervision and direction and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts he believes them to be true.

  
\_\_\_\_\_  
Donald G. Everist  
District of Columbia  
Professional Engineer  
Registration No. 5714

Subscribed and sworn to before me this 5<sup>th</sup> day of December, 1997.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 2/28/98

This Engineering Statement has been prepared on behalf of KCOP Television, Inc, licensee of KCOP(TV), Channel 13, Los Angeles, California. In a submission to the Federal Communications Commission on November 20, 1997, in MM Docket No. 87-268, the Association for Maximum Service television, Inc. and Other Broadcasters (MSTV) filed, among other things, proposed improvements to the DTV Table released by the FCC in its *Sixth Report and Order* in the above proceeding. MSTV proposed in its filing that KCOP(TV) would be allotted DTV Channel 33.

The DTV Channel 33 allotment for KCOP(TV), Los Angeles, California proposed by MSTV is not in compliance with the UHF TV Broadcasting Agreement between the United States and Mexico dated June 18, 1982. This Agreement requires allotments proposed by either Administration within 320 km of the common border to be coordinated. Allotments are made in accordance with separation distances between allotments as prescribed by the Agreement. Required minimum co-channel separation between a new US allotment and an existing Mexican allotment, for example, is required to be 280 km. The separation between KCOP(TV)'s DTV reference site and an existing NTSC Mexican allotment on Channel 33 for Tijuana, BN, Mexico is 211.6 km, which is short by 69.4 km<sup>1</sup>.

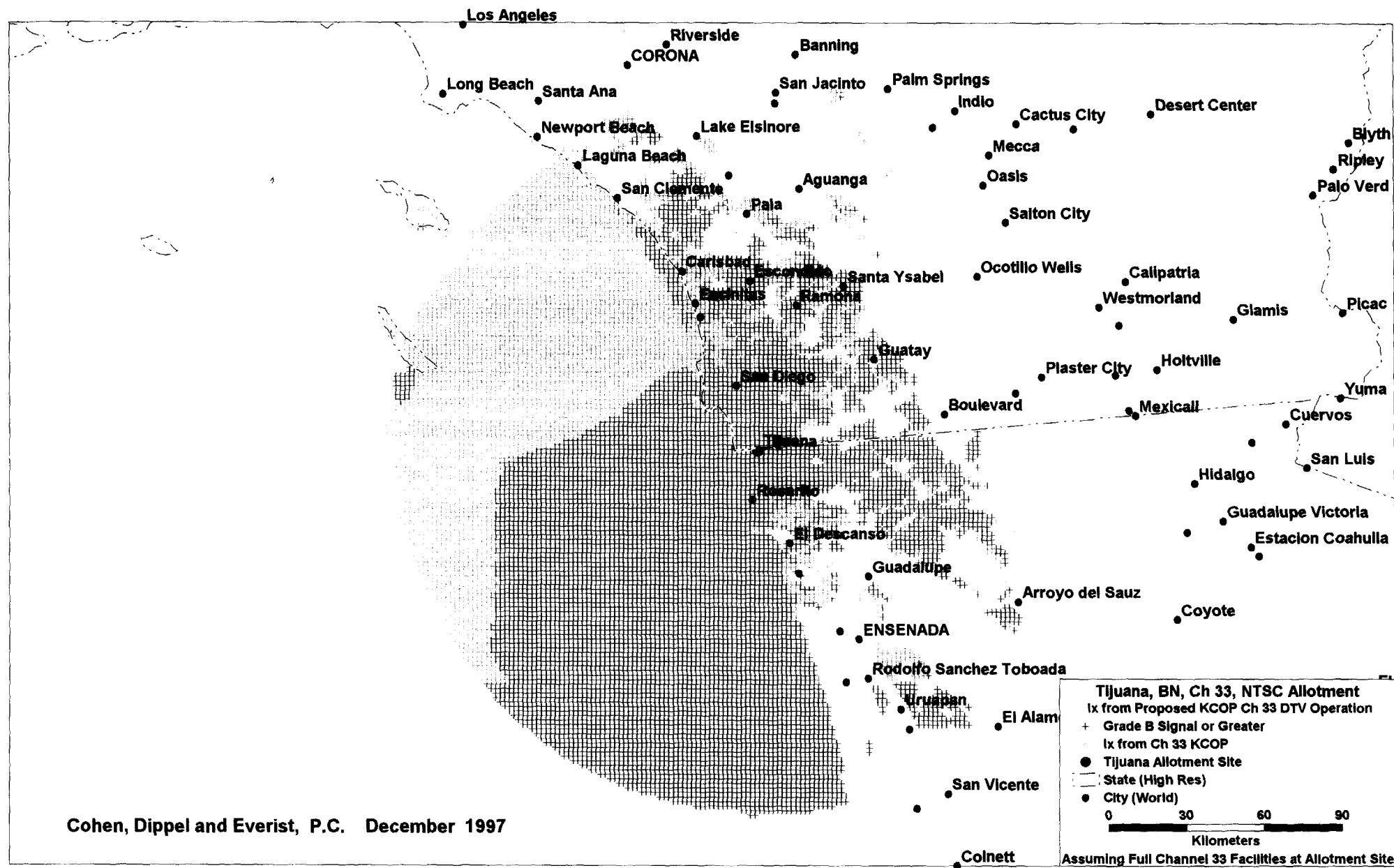
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<sup>1</sup>It is understood that the US and Mexico have reached a tentative agreement regarding DTV allotments in the border coordination zone. However, none of the details of this agreement are available and it is not known what effect, if any, it will have on MSTV's proposed KCOP Channel 33 allotment. Absent such information, it appears that reliance must be placed upon the present UHF TV Agreement noted above.

A study of interference from the proposed KCOP Channel 33 DTV allotment into the Tijuana, BN allotment was performed by this office. This study was performed using the HDTV computer program developed by the Institute of Telecommunication Sciences (ITS) in Boulder, Colorado referred to as the Communication System Performance Model-Point to Point Irregular Terrain HDTV Model ("HDTV model"). The HDTV model uses the Longley-Rice propagation methodology and evaluates in grid cell size 0.75-1.5 km with 3-second terrain data intervals between every 90 meters to 100 meters at one degree intervals. This HDTV model was selected since it is believed it generally replicates the Commission's DTV allotment model. An ITS representative indicates that the HDTV model follows the Commission's decisions in the Report and Order.

A Channel 33 NTSC station with full facilities was assumed at the Tijuana, BN reference coordinates. A Channel 33 DTV allotment was created for KCOP(TV) using the FCC method for acquiring replication (it is noted that the DTV allotment created using the ITS program was for 459.9 kW maximum ERP, whereas, MSTV proposed only 354 kW). The attached map shows that such a DTV operation on Channel 33 would cause interference to the Tijuana operation, based upon the FCC methodology for calculating interference from DTV to NTSC, both in the US as well as in Mexico.

As a result of this assessment it is concluded that MSTV's proposed DTV Channel 33 allotment for KCOP(TV) is not in compliance with the current UHF TV Broadcasting Agreement between the United States and Mexico and, therefore, is unacceptable.



Cohen, Dippel and Everist, P.C. December 1997